

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATE DEPARTMENT OF
TRANSPORTATION, et al.

Defendants,

and

METROPOLITAN TRANSPORTATION
AUTHORITY, et al.

Defendant-Intervenors.

Civil Action No. 2:23-3885 CCC-
LDW

MARK SOKOLICH, in his capacity as the Mayor
of Fort Lee and a resident of Fort Lee, and
RICHARD GALLER, individually and on behalf of
all others similarly situated,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, FEDERAL HIGHWAY
ADMINISTRATION, SHAILEN BHATT, in his
official capacity as Administrator of the Federal
Highway Administration, and RICHARD J.
MARQUIS, in his official capacity as Division
Administrator of the New York Division of the
Federal Highway Administration; THE
MANHATTAN TRANSIT AUTHORITY (MTA),
JOHN JANNO LIEBER, in his official capacity as
Chair and CEO of the MTA, the TRIBOROUGH
BRIDGE AND TUNNEL AUTHORITY (TBTA),
DANIEL DECRESCENZO, in his official capacity
as President of the (TBTA), the TRAFFIC

Civil Action No. 2:23-cv-21728 CCC-
LDW

MOBILITY REVIEW BOARD (TMRB), CARL
WEISBROD, in his capacity as Chair of the
(TMRB),

Defendants.

NOTICE OF MOTION FOR CONSOLIDATION

To: All Counsel of Record

Plaintiff, Mark Sokolich, in his capacity as the Mayor of Fort Lee and a resident of Fort Lee, and Richard Galler, individually and on behalf of all others similarly situated (herein “Movants”) respectfully submits this motion for entry of an order consolidating the above-captioned proposed class action pending in this Court, along with any related class actions that are subsequently filed in, removed to, or transferred to this Court with the first-filed action filed by the State of New Jersey.

For the reasons set forth in the accompanying memorandum of law, Movant respectfully requests that the Court approve the proposed order submitted herewith.

DATED: January 10, 2024

Respectfully submitted,
NAGEL RICE, LLP

By: s/ *Bruce H. Nagel*

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capacity as the Mayor of Fort Lee and a resident
of Fort Lee, and Richard Galler, individually and
on behalf of all others similarly situated*